

## **EXECUTIVE SUMMARY**

FEDERALLY ENFORCEABLE CONDITIONAL MAJOR

FINAL PERMIT No. F-06-015

QUEBECOR WORLD, INC.

VERSAILLES, KY

JULY 20, 2007

SOURCE I.D. #: 021-239-00005

SOURCE A.I. #: 4238

ACTIVITY I.D. #: APE20040001

An application for a Conditional Major operating permit renewal for Quebecor World, Inc. (Quebecor) for the operation of a book printing and binding plant, located at 100 U.S. Bypass 60, Versailles, Kentucky, was received by the Division on September 30, 2003.

Quebecor produces printed materials on 16 lithographic presses that have been installed at the source between January 1968 and July 2005. Emissions from these 16 lithographic presses include Volatile Organic Compounds (VOC) and hazardous air pollutants (HAP). All emissions from the press operations are directed to one of the three existing thermal oxidizers. These control devices have been installed between August 1989 and September 2001. The VOC and HAP destruction efficiency for all three thermal oxidizers is assumed to be a minimum of 98%. Compliance demonstration stack testing conducted in the last five years confirms this destruction efficiency value.

The Standard Industrial Classification (SIC) Codes for this source are 2732, 2752, and 2789, *Commercial Book Printing and Binding*. Quebecor has requested voluntary permit conditions to limit the source's potential to emit (PTE) regulated air pollutants below major source thresholds. Therefore, the source is subject to the provision of 401 KAR 52:030, *Federally enforceable permits for nonmajor sources*. This permit is the renewed issuance of the source's initial Conditional Major operating permit No. F-99-003, issued on March 31, 1999.

Woodford County is designated as attainment for all criteria pollutants. To preclude the applicability of 401 KAR 52:020, *Title V permits*, the following source-wide emission limits shall apply:

- a. Volatile organic compound (VOC) emissions: 90 tons per year;
- b. Combined hazardous air pollutant (HAP) emissions: 22.5 tons per year; and
- c. Single hazardous air pollutants (HAPs) emissions: 9 tons per year.

Compliance with the above limits shall also preclude the applicability of 401 KAR 51:017, *Prevention of significant deterioration of air quality*. The permittee shall continue to use a control device (three (3) thermal oxidizers) in order to comply with the specified emission limits. Related enforceable monitoring, record keeping and reporting requirements are included in the permit. The potential to emit all other criteria pollutants will be less than 100 tons per year each. Compliance with the VOC limit shall make this source a synthetic minor source pursuant to 401 KAR 51:017, *Prevention of significant deterioration of air quality*. Compliance with these permit limits shall also make the requirements of 401 KAR 52:020, *Title V permits*, not applicable to this source.

## **PUBLIC AND REVIEW:**

On September 7, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in The Woodford Sun in Versailles, Kentucky. In addition, notification of the issuance of the draft permit was sent to the U.S. EPA on October 26, 2006 via e-mail. The public comment period expired 30 days from the date of publication.

During the comment period the source informed (Via Phone) the Division that the draft permit was not representative to the actual facilities in the source.

On July 19, 2007, Representatives from the Permit Review Branch and Frankfort Field Office visited the plant and met with Mr. Bell Lemonds and toured the facility. As a result from the meeting/tour, the following changes have been incorporated into the final permit.

1. Removed Emission Point 50 (EU 13): Press #320 Schrieber 990 - 4/C Offset Lithographic Press with Natural Gas Fired Dryer
2. Removed Emission Point 50 (EU 49): Press #339 4/C Man-Roland - Offset Lithographic Press with Natural Gas Fired Dryer
3. Removed Emission Point 28: Spray booth dye for bookends
4. Removed Emission Point 43: Shrink Wrap operation
5. Added Emission Point 49: Sweet Dust Collector With Baghouse (Torit DFT 2-8)
6. Added Emission Point 22 (EU 22C): Paper baler # 4
7. Added condition @ Section B 1 (C): "Pursuant to 401 KAR 50:055, Section 2(5), the permittee shall operate the oxidizers at all times presses are being operated"
8. Removed Applicable Regulation @ Section B: "401 KAR 63:020, Potentially hazardous matter or toxic substances"
9. Changed condition @ Section B 3 (a)

### **From Old Condition:**

Pursuant to Section VII 2(1) of the Policy Manual of the Division for Air Quality as incorporated by reference in 401 KAR 50:016, Section 1. (1), the permittee shall submit a compliance test protocol at least one month prior to the projected test date.

### **To New Condition:**

Pursuant to 401 KAR 50:045, Section 2, a source required to conduct a performance test shall submit a completed Compliance Test Protocol form, DEP form 6028, or a test protocol a source has developed for submission to other regulatory agencies, in a format approved by the cabinet, to the Division's Frankfort Central Office a minimum of sixty (60) days prior to the scheduled test date. Pursuant to 401 KAR 50:045, Section 7, the Division shall be notified of the actual test date at least thirty (30) days prior to the test.

10. Changed condition @ Section D 3 (a)

### **From Old Condition:**

Volatile organic compound (VOC) emissions shall not equal or exceed 90 tons per twelve (12) consecutive month basis;

### **To New Condition:**

Volatile organic compound (VOC) emissions including insignificant activities and combustion shall not equal or exceed 90 tons per twelve (12) consecutive month basis.